

Exhibit 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**STIPULATION REGARDING THE MOTION OF THE DEBTORS FOR AN ORDER
AUTHORIZING THE CONTINUED REDACTION OR WITHHOLDING OF
CERTAIN CONFIDENTIAL INFORMATION OF CUSTOMERS**

This stipulation (“Stipulation”) is being entered into by and among the FTX Recovery Trust, the United States Trustee for the District of Delaware (the “U.S. Trustee”), and Bloomberg L.P., Dow Jones & Company, Inc., The New York Times Company and The Financial Times Ltd. (collectively, the “Media Intervenor” and, together with the FTX Recovery Trust or the Debtors, (as applicable), and the U.S. Trustee, the “Parties”).

WHEREAS, on November 23, 2023, the Court entered the *Interim Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on an Interim Basis and (III) Granting Certain Related Relief* [D.I. 157] (the “Interim Order”);

WHEREAS, on January 11, 2023, the Court entered the *Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for*

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief [D.I. 545] (the “Final Order”);

WHEREAS, on June 15, 2023, the Court entered the *Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 1643] (the “First Extension Order”);

WHEREAS, on June 23, 2023, the Media Intervenors filed a notice of appeal regarding the First Extension Order in this Court [D.I. 1690] and in the United States District Court for the District of Delaware (the “District Court”) [App. D.I. 1];

WHEREAS, on October 24, 2023, the Court entered the *Second Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 3353] (the “Second Extension Order” and, together with the Interim Order, Final Order and First Extension Order, the “Prior Orders”);

WHEREAS, on each of January 11, 2023, June 8, 2023, June 9, 2023 and October 24, 2023 (collectively, the “Prior Hearings”), the Court held an evidentiary hearing during which the Debtors and/or the Committee, as applicable, presented evidence on which the Court relied to enter the Prior Orders;

WHEREAS, at the October 24, 2023 hearing, in connection with granting the Second Extension Order, the Court requested that the Parties find “some way to avoid another one of these hearings in 90 days where we don’t have to go through and hear the same testimony again” (Oct. 24, 2023 Hr’g Tr. 59:16-18);

WHEREAS, on January 22, 2024, the Debtors filed the *Third Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to*

Redact or Withhold Certain Confidential Information of Customers [D.I. 6153], seeking entry of the *Third Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the “Third Extension Order”);

WHEREAS, the Parties engaged in good faith discussions to comply with the Court’s directive and agreed to the *Stipulation Regarding the Third Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 7305] on the terms set forth therein;

WHEREAS, on February 13, 2024, the Court entered the Third Extension Order [D.I. 7315], which set the Extended Redaction Deadline of May 13, 2024;

WHEREAS, on May 13, 2024, the Debtors filed the *Fourth Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 14727], seeking entry of the *Fourth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the “Fourth Extension Order”);

WHEREAS, the Parties engaged in good faith discussions to comply with the Court’s directive and agreed to the *Stipulation Regarding the Fourth Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 16147] on the terms set forth therein;

WHEREAS, on May 30, 2024, the Court entered the Fourth Extension Order [D.I. 16165], which set the Extended Redaction Deadline of August 28, 2024;

WHEREAS, on August 28, 2024, the Debtors filed the *Fifth Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to*

Redact or Withhold Certain Confidential Information of Customers [D.I. 23986], seeking entry of the *Fifth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the “Fifth Extension Order”);

WHEREAS, the Parties engaged in good faith discussions to comply with the Court’s directive and agreed to the *Stipulation Regarding the Fifth Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 24574] on the terms set forth therein;

WHEREAS, on September 12, 2024, the Court entered the Fifth Extension Order [D.I. 24588], which set the Extended Redaction Deadline to the date that is the later of (x) December 11, 2024 and (y) the effective date of the Debtors’ proposed chapter 11 plan of reorganization;

WHEREAS, On December 3, 2024, the District Court issued a decision and order affirming this Court’s entry of the First Extension Order [App. D.I. 26] (the “District Court’s Order”), and the Media Intervenors did not further appeal the District Court’s Order;

WHEREAS, on January 3, 2025, the Debtors filed the *Motion of the Debtors for an Order Authorizing the Continued Redaction or Withholding of Certain Confidential Information of Customers* [D.I. 29125] (the “Sixth Extension Motion”), seeking entry of the *Order Authorizing the Continued Redaction or Withholding of Certain Confidential Information of Customers* (the “Sixth Extension Order”);

WHEREAS, on January 3, 2025, the Debtors’ chapter 11 plan of reorganization became effective [D.I. 29127], which, among other things, established the FTX Recovery Trust and transferred, assigned, and vested all of the Debtors’ assets in the FTX Recovery Trust;

WHEREAS, the U.S. Trustee and the Media Intervenors have advised they oppose the relief requested in the Sixth Extension Motion;

WHEREAS, it is the intention of the Parties to continue to comply with the Court's directive without prejudice to any of the Parties' rights, claims, arguments, and defenses in this matter; and

WHEREAS, the Parties engaged further in good faith to comply with the Court's directive;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and among the undersigned counsel for the Parties as follows:

1. To avoid the need for an additional evidentiary hearing, and in light of the Court's directive to the Parties at the October 24, 2023 hearing, the Parties agree that the Court may rule on the Sixth Extension Motion based on the existing record of the Prior Hearings and the pleadings filed to date.

2. All Parties' rights are reserved in the event that the Court declines to enter the Sixth Extension Order based on the existing record of the Prior Hearings, including specifically the Debtors' right to offer witness testimony and other evidence in support of the Sixth Extension Motion, and the U.S. Trustee's and the Media Intervenors' right to contest such evidence and offer argument opposing such an extension.

3. All Parties' rights are reserved in the event that the Court enters the Sixth Extension Order based on the existing record of the Prior Hearings.

4. All Parties' rights, claims and defenses with respect to any requests for further extensions of the redaction deadline are reserved.

5. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Sixth Extension Motion.

Dated: January 17, 2025

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
Email: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
Email: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the FTX Recovery Trust

**ANDREW R. VARA, UNITED STATES
TRUSTEE, REGIONS 3 AND 9**

/s/ Benjamin A. Hackman

Linda Richenderfer (DE # 4138)
Benjamin A. Hackman
Trial Attorneys
United States Department of Justice
Office of the United States Trustee
J. Caleb Boggs Federal Building
844 N. King Street, Room 2207, Lockbox 35
Wilmington, DE 19801
(302) 573-6491 (Phone)
(302) 573-6497 (Fax)
linda.richenderfer@usdoj.gov
benjamin.a.hackman@usdoj.gov

/s/ William B. Larson

William B. Larson, Jr. (#5627)
John J. Klusman III (#7076)
MANNING GROSS + MASSENBURG LLP
1008 North Orange Street, Suite 711
Wilmington, DE 19801
(302) 657-2100
wlarson@mgmlaw.com
jklusman@mgmlaw.com

Counsel for Media Intervenors